

SHAW FAMILY ARCHIVES, LTD., BRADFORD
LICENSING, INC., JAMES E. DOUGHERTY,
And VALHALLA PRODUCTIONS, LLC.

05 CV 3939 (CM)

Plaintiffs/Consolidated Deendants,

Honorable Colleen
McMahon

-against-

CMG WORLDWIDE, INC.,
and MARILYN MONROE, LLC.,

Defendants/Consolidated Plaintiffs

SUPPLEMENTAL DECLARATION OF EDITH MARCUS

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Attorneys for Plaintiff/Consolidated
Defendant SFA, Plaintiffs Edith
Marcus and Meta Stevens and
Consolidated Defendant Bradford
Licensing, Inc.

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I, Edith Marcus, declare as follows:

1. I am over the eighteen years of age and am fully competent to make this Declaration. The facts contained herein are stated upon my personal knowledge.

2. I have read the Memorandum in Opposition of Marilyn Monroe, LLC ("MMLLC") to the Motion for Summary Judgment of Shaw Family Archives, Ltd. ("SFA") and Bradford Licensing, Inc. ("Bradford"), and the supporting declarations thereto,

3. With respect to the Supplemental Declaration of Mark Roesler. I dispute his allegation that I, or any other member of SFA, acknowledged, his company's (CMG's) *status as exclusive agent to MMLLC and that we acknowledged MMLLC's ownership rights of any right of publicity in Marilyn Monroe's persona.* I have never believed that MMLLC owned any right of publicity in Marilyn Monroe. My conversations with Mr. Roesler, from 1999 up till the time SFA was sued by CMG, with respect to Marilyn Monroe, was whether CMG was interested in representing my late father's work.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on the 14th day of January 2006, at Tappan, New York.


EDITH MARCUS